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Steamfitters Local 449 Pension Plan
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Liaison Counsel for Lead Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

STEAMFITTERS LOCAL 449 PENSION
PLAN, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

vs.

MOLINA HEALTHCARE, INC., J.
MARIO MOLINA, JOHN C. MOLINA,
TERRY P. BAYER, and RICK HOPFER,

Defendants.

Case No. 2:18-cv-03579 AB (JCx)

CLASS ACTION

**NOTICE OF MOTION AND
LEAD PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT
AND PLAN OF ALLOCATION**

Date: October 22, 2020

Time: 10:00 a.m.

Court: 7B (Hon. André Birotte Jr.)

1 TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

2 PLEASE TAKE NOTICE that on October 22, 2020, at 10:00 a.m., or such
3 other date and time as set by the Court, Steamfitters Local 449 Pension Plan
4 (“Lead Plaintiff”), will move before this Court, pursuant to Rule 23 of the Federal
5 Rules of Civil Procedure, for entry of an Order: (1) granting final approval of the
6 proposed class action settlement and (2) granting approval of the proposed Plan of
7 Allocation for the proceeds of the settlement.

8 This Motion is supported by the accompanying Memorandum of Points and
9 Authorities in Support of Motion for Final Approval of Class Action Settlement
10 and Plan of Allocation and the accompanying Declaration of Christine M. Fox in
11 Support of (I) Lead Plaintiff’s Motion for Final Approval of Class Action
12 Settlement and Plan of Allocation and (II) Lead Counsel’s Motion for an Award
13 of Attorneys’ Fees and Payment of Expenses, dated September 17, 2020, and the
14 exhibits attached thereto (filed concurrently herewith); the pleadings and other
15 documents on file in this action; and all other written material or oral argument as
16 may be presented to the Court.

17 Although proposed orders are being submitted herewith pursuant to Local
18 Civil Rule 7-20, updated orders may be submitted with Lead Plaintiff’s reply
19 submission on or before October 15, 2020, after the deadlines for seeking
20 exclusion and objecting have passed.

21 **CIVIL LOCAL RULE 7-3**

22 This motion is being filed pursuant to paragraph 24 of the Court’s Order
23 Granting Preliminary Approval of Class Action Settlement, Approving Form and
24 Manner of Notice, and Setting Date for Hearing on Final Approval of Settlement
25 (ECF No. 86).

1
2 Dated: September 17, 2020

Respectfully submitted,

LABATON SUCHAROW LLP

3
4 By: /s/ Christine M. Fox
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19 *Liaison Counsel for Lead Plaintiff*

CERTIFICATE OF SERVICE

I hereby certify that on September 17, 2020, I authorized the electronic filing of the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing by e-mail to all counsel registered to receive such notice.

/s/ Christine M. Fox

Christine M. Fox